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*Attorneys for Debtors and
Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ELEVENTH STIPULATION BY AND
BETWEEN REORGANIZED
DEBTORS AND THE UNITED
STATES OF AMERICA REGARDING
DEADLINE FOR REORGANIZED
DEBTORS TO OBJECT TO CLAIMS**

[No Hearing Requested]

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
2 “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the
3 Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter**
4 **11 Cases**”), on the one hand, and the United States of America, on behalf of various federal
5 agencies (“**United States**,” and together with the Debtors and the Reorganized Debtors, the
6 “**Parties**”), on the other hand, by and through their respective counsel, hereby stipulate and agree
7 as follows:

8 **RECITALS**

9 A. On January 29, 2019, the Debtors commenced these Chapter 11 Cases in the United
10 States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”). The
11 Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Rule
12 1015(b) of the Federal Rules of Bankruptcy Procedure.

13 B. By Order dated June 20, 2020 [Dkt. No. 8053] (the “**Confirmation Order**”), the
14 Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*
15 *Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented from
16 time to time, and together with any exhibits or schedules thereto, the “**Plan**”).¹ The Effective Date
17 of the Plan occurred on July 1, 2020. *See* Dkt. No. 8252. Pursuant to Section 7.1 of the Plan (as
18 approved by Paragraph 31 of the Confirmation Order), the Reorganized Debtors may object to
19 Claims until the later of (i) one hundred and eighty (180) days after the Effective Date (i.e.,
20 December 28, 2020) and (ii) such later date as may be fixed by the Bankruptcy Court for cause
21 shown. Plan § 7.1.

22 C. On October 27, 2020, the Reorganized Debtors filed the *Motion for Entry of an*
23 *Order Extending Deadline for the Reorganized Debtors to Object to Claims* [Dkt. No. 9355],
24 which the Court granted with certain limited modifications in the *Order Extending Deadline for*
25 *the Reorganized Debtors to Object to Claims* [Dkt. No. 9563] (the “**First Extension Order**”).

26
27 ¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the
28 Plan or Confirmation Order.

1 The First Extension Order extended the Reorganized Debtors' deadline under Section 7.1 of the Plan
2 to object to Claims by one hundred eighty (180) days, through and including June 26, 2021. The
3 First Extension Order extended the deadline for the Reorganized Debtors to object to **United States**
4 **Claims**—defined therein as Class 4B Utility General Unsecured Claims of the United States that
5 were identified by claim number and amount in Docket No. 9718, as required by the First Extension
6 Order—through and including March 31, 2021.

7 D. On March 17, 2021, the Reorganized Debtors filed the *Motion for Entry of an Order*
8 *Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief*
9 [Dkt. No. 10409], which the Court granted with certain limited modifications in the *Order Further*
10 *Extending Deadline for the Reorganized Debtors to Object to Claims and Granting Related Relief*
11 [Dkt. No. 10494] (the “**Second Extension Order**”). The Second Extension Order further extended
12 the Reorganized Debtors' deadline under Section 7.1 of the Plan to object to Claims by one hundred
13 eighty (180) days, through and including December 23, 2021. The Second Extension Order did not
14 address the United States Claims.

15 E. On March 25, 2021, the Parties filed a *Stipulation by and Between Reorganized*
16 *Debtors and the United States of America Regarding Deadline for Reorganized Debtors to Object to*
17 *Claims* [Dkt. No. 10459] (the “**First Stipulation**”), which the Court approved the same day [Dkt.
18 No. 10463]. The First Stipulation provided that the objection deadline for seven of the United States
19 Claims² would be extended to July 30, 2021, and that the objection deadline for the other three
20 United States Claims³ would be extended to September 30, 2021.

21 F. On July 26, 2021, the Parties filed a *Second Stipulation by and Between Reorganized*
22 *Debtors and the United States of America Regarding Deadline for Reorganized Debtors to Object to*
23 *Claims* [Dkt. No. 10983] (the “**Second Stipulation**”), which the Court approved on July 27, 2021
24 [Dkt. No. 10986]. The Second Stipulation provided that the objection deadline for United States
25 Claim Nos. 59493, 63748, and 62632 would be extended to October 1, 2021; the objection deadline
26

27 ² Claim Nos. 59493, 59662, 59712, 63092, 63748, 62632, and 17112.

28 ³ Claim Nos. 59664, 63837, and 63756.

1 for United States Claim Nos. 59662, 59712, and 63902 would be extended to November 1, 2021;
2 and the objection deadline for United States Claim Nos. 59664, 63837, and 63756 would be
3 extended to December 31, 2021.

4 G. On September 28, 2021, the Parties filed a *Third Stipulation by and Between*
5 *Reorganized Debtors and the United States of America Regarding Deadline for Reorganized*
6 *Debtors to Object to Claims* [Dkt. No. 11349] (the “**Third Stipulation**”), which the Court approved
7 on September 29, 2021 [Dkt. No. 11359]. The Third Stipulation provided that the objection deadline
8 for United States Claim Nos. 59493, 63748, and 62632 would be extended to November 1, 2021; the
9 objection deadline for United States Claim Nos. 59662, 59712, and 63902 would be extended to
10 December 1, 2021; and the objection deadline for United States Claim Nos. 59664, 63837, and
11 63756 would remain December 31, 2021.

12 H. On October 27, 2021, the Parties filed a *Fourth Stipulation by and Between*
13 *Reorganized Debtors and the United States of America Regarding Deadline for Reorganized*
14 *Debtors to Object to Claims* [Dkt. No. 11497] (the “**Fourth Stipulation**”), which the Court
15 approved on October 28, 2021 [Dkt. No. 11505]. The Fourth Stipulation provided that the objection
16 deadline for United States Claim Nos. 59493, 63748, and 62632 would be extended to November 16,
17 2021; the objection deadline for United States Claim Nos. 59662, 59712, and 63902 would remain
18 December 1, 2021; and the objection deadline for United States Claim Nos. 59664, 63837, and
19 63756 would remain December 31, 2021.

20 I. On November 4, 2021, the Court issued an *Order Further Extending Deadline for the*
21 *Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No. 11533] (the “**Third**
22 **Extension Order**”). The Third Extension Order further extended the Reorganized Debtors’
23 deadline under Section 7.1 of the Plan to object to Claims by one hundred eighty (180) days, through
24 and including June 21, 2022, without prejudice to the right of the Reorganized Debtors to seek
25 additional extensions thereof, but expressly left the Parties’ stipulated United States Claim deadlines
26 unchanged.

27 J. On November 12, 2021, the Parties filed a *Fifth Stipulation by and Between*
28 *Reorganized Debtors and the United States of America Regarding Deadline for Reorganized*

1 *Debtors to Object to Claims* [Dkt. No. 11577] (the “**Fifth Stipulation**”), which the Court approved
2 on November 15, 2021 [Dkt. No. 11583]. The Fifth Stipulation provided that the objection deadline
3 for United States Claim Nos. 59493, 63748, and 62632 would be extended to December 1, 2021; the
4 objection deadline for United States Claim Nos. 59662, 59712, and 63902 would remain December
5 1, 2021; and the objection deadline for United States Claim Nos. 59664, 63837, and 63756 would
6 remain December 31, 2021.

7 K. On November 24, 2021, the Parties filed a *Sixth Stipulation by and Between*
8 *Reorganized Debtors and the United States of America Regarding Deadline for Reorganized*
9 *Debtors to Object to Claims* [Dkt. No. 11620] (the “**Sixth Stipulation**”), which the Court approved
10 the same day [Dkt. No. 11623]. The Sixth Stipulation provided that the objection deadline for all
11 nine remaining United States Claims would be December 31, 2021.

12 L. The Parties resolved United States Claim Nos. 59493, 63748, and 62632.

13 M. On December 20, 2021, the Parties filed a *Seventh Stipulation by and Between*
14 *Reorganized Debtors and the United States of America Regarding Deadline for Reorganized*
15 *Debtors to Object to Claims* [Dkt. No. 11715] (the “**Seventh Stipulation**”), which the Court
16 approved the same day [Dkt. No. 11718]. The Seventh Stipulation provided that the objection
17 deadline for United States Claim Nos. 59662, 59712, and 63902 would be January 31, 2022, and that
18 the objection deadline for United States Claim Nos. 59664, 63837, and 63756 would be June 21,
19 2022.

20 N. The Parties resolved United States Claim Nos. 59662, 59712, and 63902.

21 O. On May 19, 2022, the Court issued an *Order Further Extending Deadline for the*
22 *Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No. 12432] (the
23 “**Fourth Extension Order**”). The Fourth Extension Order further extended the Reorganized
24 Debtors’ deadline under Section 7.1 of the Plan to object to Claims by one hundred eighty (180)
25 days, through and including December 19, 2022, without prejudice to the right of the Reorganized
26 Debtors to seek additional extensions thereof, but expressly left the Parties’ stipulated United States
27 Claim deadlines unchanged.
28

1 P. On June 2, 2022, the Parties filed an *Eighth Stipulation by and Between Reorganized*
2 *Debtors and the United States of America Regarding Deadline for Reorganized Debtors to Object to*
3 *Claims* [Dkt. No. 12480] (the “**Eighth Stipulation**”), which the Court approved on June 8, 2022
4 [Dkt. No. 12499]. The Eighth Stipulation provided that the objection deadline for the remaining
5 three United States Claims—Nos. 59664, 63837, and 63756—would be December 19, 2022.

6 Q. On December 14, 2022, the Parties filed a *Ninth Stipulation by and Between*
7 *Reorganized Debtors and the United States of America Regarding Deadline for Reorganized*
8 *Debtors to Object to Claims* [Dkt. No. 13355] (the “**Ninth Stipulation**”), which the Court approved
9 on December 15, 2022 [Dkt. No. 13362]. The Ninth Stipulation provided that the objection deadline
10 for the remaining three United States Claims—Nos. 59664, 63837, and 63756—would be June 20,
11 2023.

12 R. On December 15, 2022, the Court issued an *Order Further Extending Deadline for*
13 *the Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No. 13363] (the
14 “**Fifth Extension Order**”). The Fifth Extension Order further extended the Reorganized Debtors’
15 deadline under Section 7.1 of the Plan to object to Claims by one hundred eighty (180) days, through
16 and including June 20, 2023, without prejudice to the right of the Reorganized Debtors to seek
17 additional extensions thereof.

18 S. On June 14, 2023, the Parties filed a *Tenth Stipulation by and Between Reorganized*
19 *Debtors and the United States of America Regarding Deadline for Reorganized Debtors to Object to*
20 *Claims* [Dkt. No. 13837] (the “**Tenth Stipulation**”), which the Court approved on June 15, 2023
21 [Dkt. No. 13839]. The Tenth Stipulation provided that the objection deadline for the remaining three
22 United States Claims—Nos. 59664, 63837, and 63756—would be December 18, 2023.

23 T. On June 26, 2023, the Court issued an *Order Further Extending Deadline for the*
24 *Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No. 13363] (the “**Sixth**
25 **Extension Order**”). The Sixth Extension Order further extended the Reorganized Debtors’ deadline
26 under Section 7.1 of the Plan to object to Claims by one hundred eighty (180) days, through and
27
28

1 including December 18, 2023, without prejudice to the right of the Reorganized Debtors to seek
2 additional extensions thereof.⁴

3 U. On November 30, 2023, the Court issued an *Order Further Extending Deadline for*
4 *the Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No. 14153] (the
5 “**Seventh Extension Order**”). The Seventh Extension Order further extended the Reorganized
6 Debtors’ deadline under Section 7.1 of the Plan to object to Claims by one hundred eighty (180)
7 days, through and including June 17, 2024, without prejudice to the right of the Reorganized Debtors
8 to seek additional extensions thereof, but expressly left the Parties’ stipulated United States Claim
9 deadlines unchanged.

10 V. Given the complexities inherent in the remaining United States Claims—Nos. 59664,
11 63837, and 63756—the Parties believe that it would be mutually beneficial to extend the objection
12 deadline for those three Claims by 180 days, from December 18, 2023 to June 17, 2024.

13 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
14 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
15 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
16 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**
17 **TO ORDER, THAT:**

- 18 1. The objection deadline for the following United States Claims shall be June 17, 2024:

Agency	Claim No.	Amount
U.S. Forest Service	59664	\$21,029,700.59
U.S. Forest Service	63837	\$76,554,779.95
National Park Service	63756	\$90,415.07

- 22 2. This Stipulation shall constitute the entire agreement and understanding of the Parties
23 relating to the subject matter hereof and shall supersede all prior agreements and understandings
24 relating to the subject matter hereof.

25
26
27
28 ⁴ The Sixth Extension Order set a different objection deadline for Securities Claims (as defined in the Order).

1 3. This Stipulation may be executed in counterparts, each of which shall be deemed an
2 original, but all of which together shall constitute one and the same agreement.

3 4. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
4 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.
5

6
7 Dated: December 8, 2023

8 KELLER BENVENUTTI KIM LLP

9 /s/ David A. Taylor

10 David Taylor
11 *Attorneys for Debtors and*
12 *Reorganized Debtors*

/s/ Michael Tye

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